

Exhibit L

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ADREA, LLC,

Plaintiff,

v.

BARNES & NOBLE, INC.,
BARNESANDNOBLE.COM LLC, and
NOOK MEDIA LLC,

Defendants.

Civil Action No. 13-cv-4137 (JSR)

PLAINTIFF'S PRETRIAL DISCLOSURES

Plaintiff ADREA, LLC ("ADREA") provides the following pretrial disclosures under Federal Rule of Civil Procedure 26(a)(3) and the Court's Individual Rules of Practice. These disclosures are made without waiver of any rights. ADREA expressly reserves the right to modify or amend these disclosures until the final deadlines set forth in the Court's Individual Rules of Practice.

I. WITNESSES

ADREA expects to present the following witnesses at trial either through live testimony or designated deposition testimony:

1. Talal Shamoon (may call)
2. Yevgeniy Eugene Shteyn (will call)
3. David Yurkerwich (will call)

II. DEPOSITION DESIGNATIONS

ADREA designates the following portions of deposition transcripts that may be entered into evidence:

A. Defendants' Rule 30(b)(6) testimony (Jim Hilt - 09/26/2013)

ADREA'S INITIAL DEPOSITION DESIGNATIONS	B&N'S OBJECTIONS	B&N'S COUNTER DESIGNATIONS	ADREA's OBJECTIONS TO COUNTER DESIGNATIONS
6:18-24			
7:23-8:11			
25:10-17			
26:4-20			
28:2-4			
37:2-11			
57:23-58:21			
60:3-7			
60:20-62:17			
62:25-63:13			
65:24-67:21			
70:8-17			
71:8-22			
98:10-21			
121:9-122:5			
126:21-128:13			

B. Defendants' Rule 30(b)(6) testimony (Deepak Mulchandani - 10/14/2013)

ADREA'S INITIAL DEPOSITION DESIGNATIONS	B&N'S OBJECTIONS	B&N'S COUNTER DESIGNATIONS	ADREA's OBJECTIONS TO COUNTER DESIGNATIONS
7:17-8:3			
14:6-21			
24:8-13			
28:24-29:8			
133:4-20			
135:25-136:4			
136:12-137:3			
141:20-143:19			
155:24-156:3			
156:24-157:9			
158:14-19			
159:14-160:13			
160:17-25			
161:12-163:5			
163:23-164:23			
171:5-19			
174:19-175:13			
177:7-178:10			
181:11-182:4			

ADREA'S INITIAL DEPOSITION DESIGNATIONS	B&N'S OBJECTIONS	B&N'S COUNTER DESIGNATIONS	ADREA's OBJECTIONS TO COUNTER DESIGNATIONS
184:7-185:3			
186:12-187:6			
188:15-189:4			
189:11-22			
191:4-192:19			
192:24-193:20			
194:21-196:2			

C. Defendants' Rule 30(b)(6) testimony (Richard Nagle - 10/25/2013)

ADREA'S INITIAL DEPOSITION DESIGNATIONS	B&N'S OBJECTIONS	B&N'S COUNTER DESIGNATIONS	ADREA's OBJECTIONS TO COUNTER DESIGNATIONS
14:9-15:14			
16:6-17			
144:18-146:21			
179:11-180:25			
181:18-22			
185:17-186:14			

D. Eugene Shteyn (10/08/2013)

ADREA'S INITIAL DEPOSITION DESIGNATIONS	B&N'S OBJECTIONS	B&N'S COUNTER DESIGNATIONS	ADREA's OBJECTIONS TO COUNTER DESIGNATIONS
9:18-10:2			
10:6-8			
16:18-20			
17:10-25			
19:22-20:10			
38:2-39:10			
43:16-45:3			
53:13-55:3			
62:8-63:22			
70:22-72:1			
74:2-10			
74:20-75:12			
75:20-77:1			
80:6-81:20			
82:11-83:4			
107:9-22			
108:13-23			
110:14-25			

E. Talal Shamoon (10/22/2013)

ADREA'S INITIAL DEPOSITION DESIGNATIONS	B&N'S OBJECTIONS	B&N'S COUNTER DESIGNATIONS	ADREA's OBJECTIONS TO COUNTER DESIGNATIONS
7:3-13			
17:7-15			
19:16-20:3			
29:18-25			
40:2-44:7			
77:20-24			
78:1			
101:2-3			
101:9-102:16			
104:15-105:2			
137:3-6			
137:20-138:4			
147:21-23			
148:7-10			
148:13-17			
187:7-10			
187:13-188:2			
206:8-20			

III. TRIAL EXHIBITS

ADREA's initial exhibit list is attached as Exhibit A.

Dated: June 1, 2016

/s/ Colin G. Cabral

Steven M. Bauer
Brendan S. Cox (*pro hac vice*)
Micah Miller (*pro hac vice*)
PROSKAUER ROSE LLP
One International Place
Boston, Massachusetts 02110
(617) 526-9600 (telephone)
(617) 526-9800 (facsimile)
sbauer@proskauer.com
kmottley@proskauer.com
bcox@proskauer.com
mmiller@proskauer.com

Colin Cabral
PROSKAUER ROSE LLP
2049 Century Park East, Suite 3200
Los Angeles, CA 90067
(310) 284-5611 (telephone)
(310) 557-2193 (facsimile)
ccabral@proskauer.com

Kenneth Rubenstein
Baldassare Vinti
PROSKAUER ROSE LLP
11 Times Square
New York, NY 10036
(212) 969-3000 (telephone)
(212) 969-2900 (facsimile)
krubenstein@proskauer.com
bvinti@proskauer.com

Attorneys for Plaintiff ADREA, LLC

CERTIFICATE OF SERVICE

I certify that on June 1, 2016, I caused a copy of the foregoing document to be served upon counsel of record for Barnes & Noble, Inc., barnesandnoble.com llc, and Nook Media LLC by electronic mail.

Louis S. Ederer
Susan Lee Shin
Maxwell Charles Preston
Julie Simeone
ARNOLD & PORTER LLP
399 Park Avenue
New York, NY 10022-4690
Telephone: (212) 715-1000
Facsimile: (212) 715-1399
louis.ederer@aporter.com
susan.shin@aporter.com
maxwell.preston@aporter.com
julie.simeone@aporter.com

*Attorneys for Defendants Barnes & Noble, Inc.,
barnesandnoble.com llc, and Nook Media LLC*

/s/ Colin G. Cabral

EXHIBIT A

EX. NO.	DEPOSITION EXHIBIT	BEG. BATES NO.	DESCRIPTION	OBJECTION	ADMITTED		
JTX-003		ADREA0059578	Certified U.S. Patent No. 7,620,703				
JTX-006		ADREA0059069	Certified File History of U.S. Patent No. 7,620,703				
JTX-007		ADREA0019564	2010-08-24 Philips Patent Purchase Agreement				
JTX-009	Shamoon 19	ADREA0019612	2010-08-25 Formation and Framework Agreement among Discovery Communications, Inc., Intertrust Technologies Corporation, Koninklijke Philips Electronics N.V., Sony Corporation of America and Adrea, LLC				
JTX-010	Shamoon 20	ADREA0019350	2010-08-25 Amended and Restated Limited Liability Company Operating Agreement of Adrea, LLC				
JTX-011	Shamoon 21	ADREA0019760	Service Agreement between Adrea and Intertrust, effective 2010-08-25				
JTX-012	Mulchandani 36	BN-ADREA001928	2012-10-21 Adobe Content Server 4 Quick Start Guide				
JTX-013	Mulchandani 37	BN-ADREA001952	2010-11-18 Adobe Content Server 4 Release Notes Version 4.1				
JTX-014	Mulchandani 38	BN-ADREA001954	2010-11-18 Adobe Content Server 4 Technical Reference Manual				
JTX-015	Mulchandani 39	BN-ADREA002016	2010-11-18 Adobe Content Server 4 User Manual				
JTX-016	Narain 57	BN-ADREA045135	2009-03-12 Adobe Reader Mobile 9 SDK User Manual				
JTX-020		BN-ADREA048105	Summary Sales Data				
JTX-024	Nagle 3	BN-ADREA021246	Chart of Net Device Unit Sales				
JTX-025	Nagle 4	BN-ADREA021262	Chart of Net Device Unit Sales				
JTX-026	Nagle 6	BN-ADREA014488	Components Cost Chart				
JTX-027	Nagle 7	BN-ADREA009391	2012 Barnes & Noble Inc. Form 10-K				
JTX-029		BN-ADREA048045	Summary Sales Data				
JTX-031	Barnes 7	ADREA0111213	Preliminary Patent License Term Sheet between Barnes & Noble and Adrea				
JTX-032	Barnes 16	ADREA0007435	2011-11-10 Patent License and Settlement Agreement				
JTX-033	Barnes 17	ADREA0007485	2010-08-24 Patent Cross-License Agreement Among Discovery Communications and Sony Corp.				
JTX-034		n/a	B&N Unit Sales				
DTX-069		ADREA0016930	Preliminary Settlement and Partnership Proposal Between Amazon and Adrea				
PTX-014		PHILIPS0001055	Assignment for Application No. 09-635549 ('703 Patent)				

EX. NO.	DEPOSITION EXHIBIT	BEG. BATES NO.	DESCRIPTION	OBJECTION	ADMITTED		
PTX-017		PHILIPS0000068	2010-08-25 Amended Operating Agreement of Adrea LLC				
PTX-019		BN-ADREA001654	Nook Classic User Guide v 1.5				
PTX-021	Mulchandani 22	BN-ADREA000464	NOOK Color User Guide				
PTX-024	Mulchandani 24	BN-ADREA000786	NOOK Tablet User Guide				
PTX-026	Mulchandani 26	BN-ADREA000276	NOOK Simple Touch User Guide				
PTX-028		BN-ADREA046119	Nook Simple Touch with Glowlight User Guide				
PTX-029	Mulchandani 28	BN-ADREA002394	NOOK HD User Guide				
PTX-031	Mulchandani 30	BN-ADREA002833	NOOK HD+ User Guide				
PTX-033		BN-ADREA045973	Nook GlowLight User Guide				
PTX-034	Narain 46	n/a	NOOK Quick Start Guide				
PTX-035	Narain 47	n/a	NOOK Color Quick Guide				
PTX-036	Narain 48	n/a	NOOK Tablet Quick User Guide				
PTX-037	Narain 49	n/a	NOOK Quick Start Guide for the Simple Touch GlowLight				
PTX-038	Narain 50	n/a	NOOK Quick Start Guide for Simple Touch				
PTX-039	Narain 51	n/a	Quick Start Guide for NOOK HD				
PTX-040	Narain 52	n/a	Quick Start Guide for NOOK HD+				
PTX-041	Narain 53	n/a	Quick Guide NOOK GlowLight				
PTX-042	Narain 56	BN-ADREA002154	Functional Requirements Document for BRAVO v. 1.0				
PTX-043		BN-ADREA029897	2010-03-04 Encore PRD V. 0.5				
PTX-044		BN-ADREA028208	2010-03-16 Encore PRD V. 0.6				
PTX-045	Narain 59	BN-ADREA018389	2013-09-05 Encore PRD V. 0.7				
PTX-046	Narain 61	BN-ADREA031287	Encore - Core Applications Slides				
PTX-121	Barnes 9; Hilt 3	BN-ADREA024179	2012 Welcome to Barnes & Noble Annual Stockholder's Meeting				
PTX-122	Hilt 4	BN-ADREA015234	Barnes & Noble NOOK Slides				
PTX-124	Hilt 6	BN-ADREA014746	2011 NOOK Segments June 2011 Slides				
PTX-125	Hilt 7	BN-ADREA019157	2011 Oct. NOOK Brand Guidelines				
PTX-132	Narain 60	BN-ADREA028854	Document Entitled "Market Requirement Document for Encore"				
PTX-135	Nagle 5	BN-ADREA034708	Purchaser Demographics Charts				
PTX-138	Nagle 8	BN-ADREA038747	2009-2011 US Only Gross Profits				
PTX-139	Nagle 9	BN-ADREA038752	2009-2013 Revenues Chart				

EX. NO.	DEPOSITION EXHIBIT	BEG. BATES NO.	DESCRIPTION	OBJECTION	ADMITTED		
PTX-140	Nagle 10	BN-ADREA033909	2010-04-20 Barnes & Noble Executive Sales and Operation Planning Meeting Slides				
PTX-141	Nagle 11	BN-ADREA037295	2012-02 Barnes & Noble Executive Sales and Operations Planning Meeting Slides				
PTX-142	Nagle 12	BN-ADREA027371	2011-07-27 Adobe Letter to Barnes & Noble, Inc re Amendment No. 1 to Strategic DRM Agreement				
PTX-143	Nagle 13	BN-ADREA027373	2011-08-30 Amendment Two to Software License and Support Agreement				
PTX-144	Nagle 14	BN-ADREA027375	2009-10-20 Adobe Letter to Barnes & Noble, Inc. re Strategic DRM Agreement				
PTX-145	Nagle 15	BN-ADREA027421	2009-09-22 Software License and Support Agreement				
PTX-148	Nagle 18	BN-ADREA027368	Chart of Royalty Payments				
PTX-149	Nagle 19	BN-ADREA038952	Chart of Settlement Payment Terms				
PTX-150	Nagle 20	BN-ADREA029864	2011-02-02 R. Gopalakrishnan Email Forwarding Digital News				
PTX-152		BN-ADREA046670	Royalty Payment Schedule				
PTX-153		BN-ADREA047195	2013-10-14 Nook, "Client Metrics"				
PTX-154		ADREA0149001	2009-12-03 Sarah Rotman Epps, The Battle for the eBook Consumer				
PTX-159		ADREA0149013	2009-10-07 Sarah Rotman Epps, "Forrester's eReader Holiday Outlook 2009: Sales Will exceed Forrester's Earlier Projections"				
PTX-160		ADREA0149020	VSS "Communications Industry Forecast 2010-2014"				
PTX-161		ADREA0149041	VSS "Communications Industry Forecast 2009-2013"				
PTX-162		ADREA0149062	"The Battle for the eBook Consumer" Wal-Mart and Target Could Make a Bigger Play for the eBook Consumer, December 2009				
PTX-163		ADREA0149063	Sarah Rotman Epps "The Battle for the eBook Consumer" Figure 3: Wal-Mart and Target Could Make a Bigger Play for the eBook Consumer, December 2009				
PTX-166	Barnes 4	ADREA0141110	2009-11-11 eBook Market Venture				
PTX-167	Barnes 6	ADREA0099176	2008-08-29 Market Analysis Report				
PTX-170	Barnes 5	ADREA0098065	Ocean Tomo: E-Book Market Research, March 2007				
PTX-171		ADREA0098047	Ocean Tomo: E-Book Market Research, May 2008				

EX. NO.	DEPOSITION EXHIBIT	BEG. BATES NO.	DESCRIPTION	OBJECTION	ADMITTED		
PTX-172	Barnes 8	ADREA0149064	2010-04-26 "Nook outnumbers Kindle in March, says Digitimes Research"				
PTX-179		BN-ADREA023295	2012-06-01 Email from Zolna to Hilt re April + May Consumer Insights Update				
PTX-180		BN-ADREA029517	2010-01-11 "Barnes & Noble nook Named Best Gadget of 2009 in Crunchies Awards"				
PTX-182		BN-ADREA029988	2012-01-05 Email from Keating to Mulchandani re Important Memo from William Lynch Regarding Holiday Results				
PTX-183		BN-ADREA033815	Nook at a Glance				
PTX-184		BN-ADREA038295	Growth in e-reader and tablet ownership among U.S. adults				
PTX-186		BN-ADREA031790	2011-05-05 Email from Kung to Golpalakrishnan re The E-Book Effect: Barnes & Noble Worth Over \$1 Billion				
PTX-198		n/a	2013-09-13 Defendants' Responses and Objections to Plaintiff Adrea, LLC's First Set of Interrogatories				
PTX-199		n/a	2013-09-13 Defendants' Supplemental Responses and Objections to Plaintiff Adrea, LLC's First Set of Interrogatories				
PTX-200		n/a	2013-09-30 Defendants' Second Supplemental Responses and Objections to Plaintiff Adrea, LLC's First Set of Interrogatories				
PTX-201		n/a	2013-11-20 Defendants' Responses and Objections to Plaintiff Adrea, LLC First Set of Requests for Admissions				
PTX-204		n/a	NOOK 1st Edition (physical)				
PTX-205		n/a	NOOK Color (physical)				
PTX-206		n/a	NOOK Tablet (physical)				
PTX-208		n/a	NOOK Simple Touch Glowlight (physical)				
PTX-209		n/a	NOOK HD (physical)				
PTX-210		n/a	NOOK HD+ (physical)				
PTX-211		n/a	NOOK Glowlight (physical)				
PTX-225		ADREA0119182	WW Kindle Actual and Projected Sale Information (2011)				
PTX-226		ADREA0119159	WW Kindle Actual and Projected Sale Information (2008-2010)				
PTX-227		ADREA0015271	License Agreement				
PTX-228		ADREA0016925	2010-10-21 Email from McDow to Hayden re next steps - Subject to FRE 408				

EX. NO.	DEPOSITION EXHIBIT	BEG. BATES NO.	DESCRIPTION	OBJECTION	ADMITTED		
PTX-229		ADREA0111177	2013-10-24 Letter MacArthur to McDow re Exercise of Option to License, Discovery/Adrea/Amazon 2011 Agreement				
PTX-230		BN-ADREA002258	Product Requirements for Gossamer Rev 1.5				
PTX-231		BN-ADREA015786	Nook Tablet Launch Q&A				
PTX-232		BN-ADREA037549	Acclaim Launch				
PTX-233			2002-03-31 E-Centives, Inc. Form 10-Q				
PTX-234			2012-07-31 License Agreement between MacroSolve, Inc. and Decision Point Systems, Inc.				
PTX-235			2011-03-02 License Agreement between Huhem and One Step Millionaire, LLC and Ethos Environmental, Inc.				
PTX-236			2013-07-25 Blue Calypso Form 8-K Exhibit 99.1				
PTX-237			2014-02-25 Moxian Form 8-K Exhibit 10.1				
PTX-238			1998-07-23 Capita Research Group Form 10-SB-A Exhibit 10				